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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

PETER WRIGHT and MICHELLE TRAME,
individually, on behalf of all others similarly
situated, and on behalf of the general public,

Case No. CV 12-00982 EMC

Plaintiffs,

**STIPULATION AND ~~[PROPOSED]~~
ORDER CONTINUING DEADLINE
TO FILE MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

v.

ADVENTURES ROLLING CROSS
COUNTRY, Inc., dba ADVENTURES
CROSS COUNTRY (ARCC), a California
Corporation, SCOTT VON ESCHEN, and
DOES 1 through 50 inclusive

Date:
Time:
Place: Courtroom 5, 17th Floor
Hon. Edward M. Chen

Defendants.

Pursuant to Civil Local Rule 7-12, Plaintiffs Peter Wright and Michelle Trame ("Plaintiffs")
and Defendants Adventures Rolling Cross Country, Inc. ("ARCC") and Scott von Eschen
("Defendants"), by and through their attorneys of record, make the following stipulated request

1 regarding the briefing deadline for Plaintiffs' impending Motion for Final Approval of Class Action
2 Settlement, as follows:

3 WHEREAS, the Court initially set a Final Approval Hearing for January 16, 2013,
4 and a deadline of November 28, 2013 for Plaintiffs' Motion for Final Approval;

5 WHEREAS, on November 19, 2013, the Court re-set the Final Approval Hearing
6 Date for January 23, 2013;

7 WHEREAS, although the initial deadline for Class Members to postmark their Opt-in
8 Forms in this class action was November 25, 2013, the Parties and the Claims Administrator
9 extended that deadline to December 2, 2013, due to an error by the Claims Administrator causing a
10 one-week delay in the provision of correct Notice Forms to the Class Members; as such, the Parties
11 expect valid claims to continue to be submitted to the Claims Administrator through December 2,
12 2013;

13 WHEREAS, in light of the deadline for submission of Claims forms, the Parties
14 respectfully request to delay the deadline for submission of the Final Approval Motion, to allow the
15 Final Approval Motion to describe accurately the Class Members' participation in the settlement;

16 WHEREAS, in light of the Court's continuance of the Final Approval Hearing date,
17 there would be no prejudice to any party or the Court if the deadline for the Final Approval Motion
18 were continued;

19 THEREFORE IT IS HEREBY STIPULATED AND REQUESTED by and between
20 Plaintiffs and Defendants, through their respective counsel, that the Court continue the deadline for
21 filing a Final Approval Motion to December 9, 2013, by which time all claims will have been
22 submitted.

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1 Dated: November 21, 2013

BRYAN SCHWARTZ LAW

2
3 /s/ Bryan J. Schwartz

4 Bryan Schwartz, Bar No. 209903
Attorney for Plaintiffs

5 Dated: November 21, 2013

HIRSCHFELD KRAEMER LLP

6
7 /s/ Reed E. Schaper

8 Reed E. Schaper, Bar No. 082792
9 Attorneys for Defendants

10
11 ~~[proposed]~~ ORDER

12 Pursuant to the stipulation, it is SO ORDERED.

